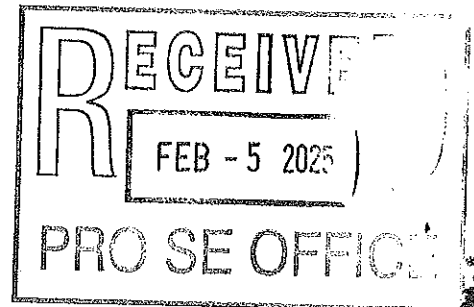




Squarex Pharmaceutical Corporation  
7460 Pinehurst Road  
Saint Paul, MN 55115  
651-492-0283  
hmctavish@squarex-pharma.com



January 31, 2025

Hon. Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007  
(212) 805-0200  
[VyskocilNYSDChambers@nysd.uscourts.gov](mailto:VyskocilNYSDChambers@nysd.uscourts.gov)

FEB 04 2025

Re: Case 1:24-cv-06880-MKV  
Squarex Pharmaceutical Corporation v. Spartan Capital Securities LLC, a division of  
Spartan Capital Holdings, LLC

**By email and express mail.**

Dear Judge Vyskocil:

I am the CEO of the Plaintiff, Squarex Pharmaceutical Corporation, in the above-referenced matter. Victor Feraru is our attorney and he has been negligent in this matter.

The Defendant, Spartan Capital, never filed an Answer in this case. Mr. Feraru attempted to file a proposed Clerk's Certificate of Default on November 21, 2024, but the clerk rejected it as deficient. He has never attempted to file a Clerk's Certificate of Default again. On December 11, 2024, and again on January 6, 2025, you made an Order to Show Cause why the case should not be dismissed under Rule 41(b), with a deadline to respond of February 17, 2025, for the second order. Our attorney Mr. Feraru has not filed a response with the court. I was aware of none of this until January 24, 2025.

Mr. Feraru emailed me a link to paper 7 in this case, the proposed Clerk's Certificate of Default on November 21, 2024. That was the last I heard about this case. I emailed Mr. Feraru several times since then beginning on December 17 asking about the status of the case and asking him to file any necessary papers, and I called him several times also. He promised to file the necessary papers "today" or "this week" several times but then never sent me any filings. I was not aware that the proposed Clerk's Certificate of Default had been

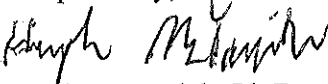
rejected by the clerk on November 22 because he never communicated that to me. Lately, he has mostly been ignoring my emails and phone calls but occasionally replying to emails by saying that he has a heart issue. He never communicated to me the two Orders to Show Cause.

I just became aware of the history of this case and the outstanding Order to Show Cause on January 24, 2025, when I called another attorney about taking over this case on that day and he looked up the case file. That attorney informed me of the PACER system, which I had not previously been aware of, and I download the docket report and all the history of this case at that time. It was only then that I was able to read the two Orders to Show Cause.

I have asked Mr. Feraru to file his withdrawal in this case, but it appears he has not done so.

It is through no fault of my own or of Squarex Pharmaceutical Corporation that our attorney Mr. Feraru has been negligent in this matter. It would be unfair to Plaintiff Squarex to dismiss this case with prejudice. I would, therefore, respectfully request that Your Honor issue an order dismissing Mr. Feraru as counsel for Squarex and allowing Plaintiff Squarex a reasonable period of time to obtain new counsel and for the new counsel to appropriately respond in this case.

Respectfully,



Hugh McTavish, Ph.D.

CEO

Squarex Pharmaceutical Corporation

PRES

PRESS FIRMLY TO SEAL

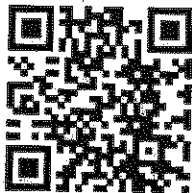
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